

1 Ray L. Wong (SBN 84193)
DUANE MORRIS LLP
2 One Market, Spear Tower, Suite 2000
San Francisco, CA 94105-1104
3 Telephone: 415.957.3000
Facsimile: 415.957-3001
4 E-Mail: rlwong@duanemorris.com

5 Michelle Hon (SBN 234492)
DUANE MORRIS LLP
6 101 West Broadway, Suite 900
San Diego, CA 92101
7 Telephone: 619.744.2200
Facsimile: 619.744.2201
8 E-Mail: mhon@duanemorris.com

9 Specially Appearing for Defendants VENETIAN
CASINO RESORT, LLC; LAS VEGAS SANDS, LLC,
10 and LAS VEGAS SANDS CORP.

11
12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
14

15 JONATHAN BROWNING, INC., a California
corporation,

16 Plaintiff,

17 v.

18 VENETIAN CASINO RESORT, LLC, a Nevada
19 limited liability company; LAS VEGAS SANDS,
LLC, a Nevada limited liability company; LAS
20 VEGAS SANDS CORP., a Nevada corporation; and
DOES 1 through 100, inclusive,

21 Defendant.
22
23

Case No.: C 07-3983 JSW

**DECLARATION OF RAY L. WONG IN
SUPPORT OF DEFENDANTS'
MOTION FOR ADMINISTRATIVE
RELIEF TO CONTINUE THE CASE
MANAGEMENT CONFERENCE
(CIVIL LOCAL RULE 7-11)**

Complaint Filed: August 2, 2007
Judge: Hon. Jeffrey S. White
Courtroom: 2, 17th floor

24
25 ///

26 ///

27 ///

28 ///

1 I, Ray L. Wong, declare:

2 1. I am an attorney licensed to practice in the State of California and I am admitted to
3 practice before this Court. I am a partner of the law firm Duane Morris LLP, and lead counsel for
4 defendants Venetian Casino Resort LLC, Las Vegas Sands LLC, and Las Vegas Sands Corp.
5 (“Defendants”). I have personal knowledge of the matters stated herein, and if called as a witness, I
6 could and would testify competently to them.

7 2. I submit this declaration in support of Defendants’ Motion for Administrative Relief
8 to Continue the Case Management Conference Date. By submitting this declaration Defendants do
9 not waive but expressly reserve their objections based on lack of personal jurisdiction or the other
10 grounds set forth in Defendants’ pending motion to dismiss.

11 3. I have an unavoidable calendar conflict with the November 16, 2007 initial Case
12 Management Conference date because I am scheduled to be at an important deposition in another
13 case currently pending in Los Angeles Superior Court on that date. The case involves multiple
14 parties and the conflicting deposition is the second day of deposition of an attorney witness. The
15 first day of deposition took months to schedule and was ultimately held on a Sunday to
16 accommodate the witnesses’ schedule. The second day of deposition was very difficult to schedule
17 and in fact begins at 7:00 a.m. to again accommodate the witnesses’ difficult schedule and cannot be
18 rescheduled without substantial prejudice to all parties in the action.

19 4. In addition, when the deposition is over, I am scheduled and registered to attend the
20 National Asian Pacific American Bar Association Conference for the remainder of that day and
21 during the weekend.

22 5. I notified Plaintiff’s counsel of my scheduling conflict and we attempted to meet and
23 confer regarding an alternate date for the Case Management Conference. We were informed by the
24 court clerk that the next available court date for a Case Management Conference was November 30,
25 2007. It is my understanding that Plaintiff’s counsel is not available on November 30, 2007. Thus,
26 the next available court date that does not conflict with Plaintiff’s counsel’s calendar is December 7,
27 2007.

28 ///

6. On November 6, 2007, Plaintiff's counsel sent me an e-mail stating that Plaintiff would not agree to continue the Case Management Conference to December 7, 2007. A true and correct copy of the November 6, 2007 e-mail is attached hereto as Exhibit A.

I declare under penalty of perjury under the laws of California and the United States of America that the foregoing is true and correct.

Executed this 8th day of November, 2007 at Los Angeles California.

/s/ Ray L. Wong
Ray L. Wong